

JOHN DILORENZO, JR., OSB #802040

[johndilorenzo@dwt.com](mailto: johndilorenzo@dwt.com)

AARON K. STUCKEY, OSB #954322

[aaronstuckey@dwt.com](mailto: aaronstuckey@dwt.com)

DAVIS WRIGHT TREMAINE LLP

560 SW 10th Ave, Suite 700

Portland, Oregon 97205

Telephone: (503) 241-2300

Facsimile: (503) 778-5299

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

AT EUGENE

MARION COUNTY, a political subdivision
of the State of Oregon, and **LINN COUNTY**,
a political subdivision of the State of Oregon,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

Case No. 6:24-cv-00781

**JOINT STATUS REPORT PURSUANT
TO COURT'S ORDER OF DECEMBER
30, 2024**

L.R. 7-1 CERTIFICATION

The parties have conferred about the subject matter of this motion and stipulate to the relief requested.

JOINT STATUS REPORT AND MOTION TO EXTEND STAY

Plaintiffs Marion County and Linn County (collectively, the “Counties”) and defendant the United States, by and through their undersigned counsel, hereby submit this Joint Status Report per the Court’s December 30, 2024 Order.

On December 30, 2024, the Court granted the parties’ Stipulated Motion to Stay pending the resolution of the appeal in *Freres Timber, Inc. v. United States*.

Freres filed their brief on March 5, 2025. The government's brief was filed May 5, 2025. The optional reply brief is due June 25, 2025. No argument has yet been scheduled. The parties agree to file further status reports with the Court every six months until the Ninth Circuit resolves the appeal.

DATED this 18th day of June 2025:

DAVIS WRIGHT TREMAINE LLP

By: s/ John DiLorenzo, Jr.
JOHN DILORENZO, JR., OSB #802040
johndilorenzo@dwt.com
AARON K. STUCKEY, OSB #954322
aaronstuckey@dwt.com
DAVIS WRIGHT TREMAINE LLP
560 SW 10th Ave, Suite 700
Portland, Oregon 97205
Telephone: (503) 241-2300

Attorneys for Plaintiffs

By: s/ Sean E. Martin
BENJAMIN T. HICKMAN, DCB #498167
SEAN E. MARTIN, OSB #054338
Assistant United States Attorneys
1000 S.W. Third Avenue, Suite 600
Portland, OR 97204
benjamin.hickman@usdoj.gov
sean.martin@usdoj.gov
Telephone: (503) 727-1000

Attorneys for Defendant